

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re Robertin Nunez

Debtor(s)

Case No. 15-15811-MDC
Chapter 13

AMENDED CHAPTER 13 PLAN AND CERTIFICATE OF SERVICE

1. **Payments to the Trustee:** The future earnings or other future income of the Debtor is submitted to the supervision and control of the trustee. The Debtor (or the Debtor's employer) shall pay to the trustee the sum of **\$9,130.00 has been paid over 11 months and pay \$ 1,860.00 per month for 49 months.**

Total of plan payments: **\$100,270.00**

2. **Plan Length:** This plan is estimated to be for **60** months.
3. Allowed claims against the Debtor shall be paid in accordance with the provisions of the Bankruptcy Code and this Plan.
 - a. Secured creditors shall retain their mortgage, lien or security interest in collateral until the earlier of (a) the payment of the underlying debt determined under nonbankruptcy law, or (b) discharge under 11 U.S.C. § 1328.
 - b. Creditors who have co-signers, co-makers, or guarantors ("Co-Obligors") from whom they are enjoined from collection under 11 U.S.C. § 1301, and which are separately classified and shall file their claims, including all of the contractual interest which is due or will become due during the consummation of the Plan, and payment of the amount specified in the proof of claim to the creditor shall constitute full payment of the debt as to the Debtor and any Co-Obligor.
 - c. All priority creditors under 11 U.S.C. § 507 shall be paid in full in deferred cash payments.
4. From the payments received under the plan, the trustee shall make disbursements as follows:

a. Administrative Expenses

- (1) Trustee's Fee: **Amount to be determined by the Office of the U. S. Trustee.**
- (2) Attorney's Fee (unpaid portion): **\$3,000.00 to be paid through plan in monthly payments**
- (3) Filing Fee (unpaid portion): **NONE**

b. Priority Claims under 11 U.S.C. § 507

(1) Domestic Support Obligations- see below

(a) Debtor is required to pay all post-petition domestic support obligations directly to the holder of the claim.

(b) The name(s) and address(es) of the holder of any domestic support obligation are as follows. See 11 U.S.C. §§ 101(14A) and 1302(b)(6).

**-Walkiria Peralta 545 Newton Lake Road Apt 304 Collinswood NJ
08107**

(c) Anticipated Domestic Support Obligation Arrearage Claims. Unless otherwise specified in this Plan, priority claims under 11 U.S.C. § 507(a)(1) will be paid in full pursuant to 11 U.S.C. § 1322(a)(2). These claims will be paid at the same time as claims secured by personal property, arrearage claims secured by real property, and arrearage claims for assumed leases or executory contracts.

Creditor (Name and Address)
-NONE-

Estimated arrearage claim

Projected monthly arrearage payment

(d) Pursuant to §§ 507(a)(1)(B) and 1322(a)(4), the following domestic support obligation claims are assigned to, owed to, or recoverable by a governmental unit.

Camden County Probation
(Domestic Support) Market Street,
Camden NJ 08101
-NONE-

(2) Other Priority Claims.

Name	Amount of Claim	Interest Rate (If specified)
Camden Cty Probation (Walkiria Peralta)	6,106.00	0.00%

c. Secured Claims SEE BELOW

(2) Secured Debts Which Will Not Extend Beyond the Length of the Plan

(a) Secured Claims Subject to Valuation Under § 506. The Debtor moves the Court to value collateral as follows according to 11 U.S.C. § 506(a). Each of the following secured claims, if allowed, shall be paid through the plan in equal monthly payments set forth below, until the secured value or the amount of the claim, whichever is less, has been paid in full. Any remaining portion of the allowed claim shall be treated as a general unsecured claim. Any claim with a secured value of \$0 shall be treated as a general unsecured claim.

Name	Proposed Amount of Allowed Secured Claim	Interest Rate (If specified)
City of Camden	1,363.00	0.00%
City of Camden	1,116.21	0.00%
City of Philadelphia (Claim 17) Water/sewer	21,886.34	
	surrendered 2720	
	N Front. 648.97	
	not part of this claim	

(3) Secured Debts Which Will Not Extend Beyond the Length of the Plan

Name	Amount of Claim	Monthly Payment	Interest Rate (If specified)
-Barbara Marshall	4643.21		
Internal Revenue Service	3055.37		
City of Philadelphia (tax portion) Claim 13	3,826.51 plus interest for a total amount to be paid \$4,766.55 taxes 2716 N. Front Street		9
City of Philadelphia (judgment portion) Claim 13	3,381.00 payable at 6% for a total amount to be paid \$3,921.84		6

d. Unsecured Claims Pro rata on timely filed allowed Unsecured Claims.

5. The Debtor proposes to cure defaults to the following creditors by means of monthly payments by the trustee:

Creditor	Amount of Default to be Cured
American Loans	11,000.00
Chase Mtg	10,419.32
Chase Mtg	6,000.00
Wfhm	1,306.61
WFHM	1,008.42
J.P. Morgan Chase	10,840.46
Emigrant Morgage Co.	647.32

6. The Debtor shall make regular payments directly to the following creditors: Debtor shall make regular post petition payments

Name	Amount of Claim
American Loans	116,000.00
Chase Mtg (Claim 8)	100,366.41
Chase Mtg	80,200.00
Emigrant Mortgage Co	43,638.92
JP Morgan Chase Bank	142,820.66
Tanya Guerrero	27,937.00
Wfhm	67,832.23
WFHM (claim 15)	66,297.59

7. The employer on whom the Court will be requested to order payment withheld from earnings is:
NONE. Payments to be made directly by debtor without wage deduction.

8. The following executory contracts of the debtor are rejected:

Other Party	Description of Contract or Lease
-NONE-	

9. Property to Be Surrendered to Secured Creditor

Name	Amount of Claim	Description of Property
ACM Patriot LN IV B, LLC	114,000.00	125 W. Roosevelt Blvd, Philadelphia, PA 19120 surrender all right title and interest
City of Philadelphia, Law Department	1,058.45	2720 N. Front Street, Philadelphia, PA 19133 SURRENDERING AT TAX SALE DEBTOR SURRENDERS ALL RIGHT TITLE AND INTEREST TO EMPTY LOT
Equiant Financial Svcs	0.00	Resort Financials Time Share, 1420 Ocean Drive, Miami Beach, FL 33135 surrendering
JP Morgan Chase Bank	45,026.00	214 South Alden Street, Philadelphia, PA 19132 **Property sold at Sheriff's sale on June 4, 2015 for \$22,500
Prime Funding	96,000.00	3837 N. Broad Street, Philadelphia, PA 19140 SURRENDER ALL RIGHT TITLE AND INTEREST
Prime Funding	0.00	2235 N 19th Street Philadelphia Pa 19132 surrendering property

10. The following liens shall be avoided pursuant to 11 U.S.C. § 522(f), or other applicable sections of the Bankruptcy Code:

Name	Amount of Claim	Description of Property
-NONE-		

11. Title to the Debtor's property shall vest in debtor **on confirmation of a plan.**

12. As used herein, the term "Debtor" shall include both debtors in a joint case.

13. Other Provisions:

NO PAYMENTS TO BE MADE ON A PORTION OF CLAIM 13 TO THE CITY OF PHILADELPHIA IN THE AMOUNT OF \$ 7,724.02. THIS PROPERTY WAS SURRENDERED AT TAX SALE.

NO PAYMENTS TO BE MADE ON PORTION OF CLAIM 17 SECURED REGARDING PROPERTY LOCATED AT 2720.00 IN THE AMOUNT OF 648.97. PROPERTY SURRENDERED AT TAX SALE

Date August 1, 2016

Signature /s/ Robertin Nunez
Robertin Nunez
Debtor

CERTIFICATE OF SERVICE

THE CHAPTER 13 TRUSTEE, SECURED AND PRIORITY CREDITORS ARE BEING SERVED A COPY OF THE AMENDED CHAPTER 13 PLAN.

/s/ David M. Offen
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